

Exhibit “4”

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ENCORE RECEIVABLE MANAGEMENT, INC.

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

SAMUEL KWESI DADJO,

Plaintiff,

vs.

ENCORE RECEIVABLE
MANAGEMENT, INC., a Kansas
corporation,

Defendant.

CASE NO. C 07 05856 SC

[Complaint Filed: 11/19/07]

**DEFENDANT'S RESPONSE TO
PLAINTIFF'S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS**

Judge: Hon. Samuel Conti
Courtroom 1

PROPOUNDING PARTY: Plaintiff, SAMUEL KWESI DADJO

RESPONDING PARTY: Defendant, ENCORE RECEIVABLE MANAGEMENT, INC.

SET NUMBER: ONE

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant answers the following Request for Production of Documents:

This responding party has not fully completed its investigation of the facts relating to this case, have not fully completed its discovery in this action, and has not fully completed its preparation for trial. All of the responses contained based only upon such information and documents presently available to and specifically known to this responding party and disclose only

those contentions which are presently known to this responding party. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, add meaning to the known facts, as well as establish entirely new factual and legal conclusions, all of which may lead to substantial additions to, changes and variations from the contentions set forth herein.

The following responses are given without prejudice to this responding party's right to produce any evidence of any undiscovered fact or facts which this responding party may later recall or locate. Responding party accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analyses are made, legal research is completed and contentions are made. The responses contained herein are made in a good faith effort to supply as much factual information and as much specification of legal contentions as is presently known but should in no way be to the detriment of this responding party in relation to further discovery. It should further be noted that these discovery responses are made solely for the purpose of this action.

REQUESTS FOR PRODUCTION AND RESPONSES

REQUEST FOR PRODUCTION NO. 1:

All **DOCUMENTS** on which you relied in anyway [sic] in preparing answers to Plaintiff's interrogatories served simultaneously herewith.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

See attached account notes.

REQUEST FOR PRODUCTION NO. 2:

All **DOCUMENTS** which you specially mention in any answer to Plaintiff's interrogatories served simultaneously herewith.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

See attached account notes.

REQUEST FOR PRODUCTION NO. 3:

All **DOCUMENTS** which were specifically mentioned or requested in the text of any of Plaintiff's interrogatories served simultaneously herewith.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

See attached account notes.

REQUEST FOR PRODUCTION NO. 4:

All **DOCUMENTS** which you intend to utilize at a trial or hearing in this matter.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Encore objects to Plaintiff's Request for Production of Documents No. 4 on the grounds that request is premature, overly broad, unduly burdensome, not relevant to a claim or defense of any party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent Plaintiff seeks the following: "All **DOCUMENTS** which you intend to utilize at a trial or hearing in this matter." Responding party further objects to the request to the extent it seeks proprietary or trade secret information. Subject to and without waiving the foregoing objections, responding party states: See attached account notes. Encore will produce its training manuals utilized in connection with its collection process, training programs and ongoing training programs upon the entry of a suitable protective order as the documents contain confidential and/or proprietary information and/or the trade secrets of Encore. Certain materials are written, others are computerized and others are audio/visual. Encore reserves the right to supplement this response as necessary throughout litigation of this matter.

REQUEST FOR PRODUCTION NO. 5:

All **DOCUMENTS** identified or listed in **YOUR** Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) in this case.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Encore objects to Plaintiff's Request for Production of Documents No. 5 on the grounds that request is premature, overly broad, unduly burdensome, not relevant to a claim or defense of any party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent Plaintiff seeks the following: "**All DOCUMENTS identified or listed in YOUR Initial Disclosure** pursuant to Fed. R. Civ. P. 26(a)(1) in this case" (emphasis added). Encore reserves the right to supplement this response as necessary throughout litigation of this matter.

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REQUEST FOR PRODUCTION NO. 6:

All **DOCUMENTS** relating in any way to the alleged debt of Plaintiff and the collection thereof.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

See attached account notes.

REQUEST FOR PRODUCTION NO. 7:

An organizational chart for Defendant, ENCORE RECEIVABLE MANAGEMENT, INC.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Encore objects to Plaintiff's Request for Production of Documents No. 7 on the grounds that request is unduly burdensome, not relevant to a claim or defense of any party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent Plaintiff seeks the following: "**An organizational chart for Defendant, ENCORE RECEIVABLE MANAGEMENT, INC.**" (emphasis added).

REQUEST FOR PRODUCTION NO. 8:

Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC. in the past 3 years alleging violations of the Federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692d(5).

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Encore objects to Plaintiff's Request for Production of Documents No. 8 on the grounds that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that Plaintiff seeks the following: "**Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., in the past 3 years** alleging violations of the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692d(5)" (emphasis added). Subject to and without waiving said objections, the fact that a suit has been brought in any jurisdiction alleging facts completely different and unrelated to the allegations in Plaintiff's Complaint is completely irrelevant. In addition, and without waiving said objections, Encore states that no action has ever been brought which has resulted in a judgment

1 against Encore. Further, and without waiving said objections, Plaintiff is seeking information that
2 is of public record.

3 **REQUEST FOR PRODUCTION NO. 9:**

4 Copies of the Complaint for any litigation filed against Defendant, ENCORE
5 RECEIVABLE MANAGEMENT, INC. in the past 3 years alleging violations of the Federal Fair
6 Debt Collection Practices Act, 15 U.S.C. § 1692d(6).

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

8 Encore objects to Plaintiff's Request for Production of Documents No. 9 on the grounds
9 that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of
10 any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible
11 evidence to the extent that Plaintiff seeks the following: "**Copies of the Complaint for any**
12 **litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., in the**
13 **past 3 years** alleging violations of the federal Fair Debt Collection Practices Act, 15 U.S.C. §
14 1692d(6)" (emphasis added). Subject to and without waiving said objections, the fact that a suit
15 has been brought in any jurisdiction alleging facts completely different and unrelated to the
16 allegations in Plaintiff's Complaint is completely irrelevant. In addition, and without waiving said
17 objections, Encore states that no action has ever been brought which has resulted in a judgment
18 against Encore. Further, and without waiving said objections, Plaintiff is seeking information that
19 is of public record.

20 **REQUEST FOR PRODUCTION NO. 10:**

21 Copies of the Complaint for any litigation filed against Defendant, ENCORE
22 RECEIVABLE MANAGEMENT, INC. in the past 3 years alleging violations of the Federal Fair
23 Debt Collection Practices Act, 15 U.S.C. § 1692d(11).

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

25 Encore objects to Plaintiff's Request for Production of Documents No. 10 on the grounds
26 that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of
27 any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible
28 evidence to the extent that Plaintiff seeks the following: "**Copies of the Complaint for any**

litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., in the past 3 years alleging violations of the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692d(11)" (emphasis added). Subject to and without waiving said objections, the fact that a suit has been brought in any jurisdiction alleging facts completely different and unrelated to the allegations in Plaintiff's Complaint is completely irrelevant. In addition, and without waiving said objections, Encore states that no action has ever been brought which has resulted in a judgment against Encore. Further, and without waiving said objections, Plaintiff is seeking information that is of public record.

REQUEST FOR PRODUCTION NO. 11:

Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC. in the past 3 years alleging violations of California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788.11(b).

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Encore objects to Plaintiff's Request for Production of Documents No. 11 on the grounds that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that Plaintiff seeks the following: "**Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., in the past 3 years** alleging violations of the federal California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788.11(b)" (emphasis added). Subject to and without waiving said objections, the fact that a suit has been brought in any jurisdiction alleging facts completely different and unrelated to the allegations in Plaintiff's Complaint is completely irrelevant. In addition, and without waiving said objections, Encore states that no action has ever been brought which has resulted in a judgment against Encore. Further, and without waiving said objections, Plaintiff is seeking information that is of public record.

REQUEST FOR PRODUCTION NO. 12:

Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC. in the past 3 years alleging violations of California

Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788.11(d).

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Encore objects to Plaintiff's Request for Production of Documents No. 12 on the grounds that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that Plaintiff seeks the following: "**Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., in the past 3 years** alleging violations of the California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788.11(d)" (emphasis added). Subject to and without waiving said objections, the fact that a suit has been brought in any jurisdiction alleging facts completely different and unrelated to the allegations in Plaintiff's Complaint is completely irrelevant. In addition, and without waiving said objections, Encore states that no action has ever been brought which has resulted in a judgment against Encore. Further, and without waiving said objections, Plaintiff is seeking information that is public record.

REQUEST FOR PRODUCTION NO. 13:

Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC. in the past 3 years alleging violations of California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788.11(e).

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Encore objects to Plaintiff's Request for Production of Documents No. 13 on the grounds that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that Plaintiff seeks the following: "**Copies of the Complaint for any litigation filed against Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., in the past 3 years** alleging violations of the California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788.11(e)" (emphasis added). Subject to and without waiving said objections, the fact that a suit has been brought in any jurisdiction alleging facts completely different and unrelated to the allegations in Plaintiff's Complaint is completely irrelevant. In addition, and

without waiving said objections, Encore states that no action has ever been brought which has resulted in a judgment against Encore. Further, and without waiving said objections, Plaintiff is seeking information that is of public record.

REQUEST FOR PRODUCTION NO. 14:

Any insurance policies covering Defendant, ENCORE RECEIVABLE MANAGEMENT, INC. for violation of the Fair Debt Collection Practices Act or the Rosenthal Fair Debt Collection Practices Act.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

None.

REQUEST FOR PRODUCTION NO. 15:

All DOCUMENTS in Defendant, ENCORE RECEIVABLE MANAGEMENT, INC.'s possession sent to or received from anyone which in any way relate to the debt owed by Plaintiff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Encore objects to Plaintiff's Request for Production of Documents No. 15 on the grounds that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that Plaintiff seeks the following: "All DOCUMENTS in Defendant, ENCORE RECEIVABLE MANAGEMENT, INC.'s, possession sent to or received from anyone which in any way relate to the debt owed by Plaintiff" (emphasis added). Further, and without waiving said objections, Plaintiff is seeking proprietary and/or confidential information.

REQUEST FOR PRODUCTION NO. 16:

All DOCUMENTS in Defendant, ENCORE RECEIVABLE MANAGEMENT, INC.'s possession sent to or received from Plaintiff which in any way relate to the debt owed by Plaintiff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Encore objects to Plaintiff's Request for Production of Documents No. 16 on the grounds that the request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party to this lawsuit, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that Plaintiff seeks the following: "All DOCUMENTS in Defendant,

1 **ENCORE RECEIVABLE MANAGEMENT, INC.'s, possession sent to or received from**
 2 **Plaintiff** which in any way relate to the debt owed by Plaintiff" (emphasis added). Further, and
 3 without waiving said objections, Plaintiff is seeking proprietary and/or confidential information.

4 **REQUEST FOR PRODUCTION NO. 17:**

5 All operation manuals or similar **DOCUMENTS**, etc., utilized by Defendant, ENCORE
 6 RECEIVABLE MANAGEMENT, INC. relating to its compliance with the Federal Fair Debt
 7 Collection Practices Act, 15 U.S.C. § 1692 *et seq.*

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

9 Encore objects to Plaintiff's Request for Production of Documents No. 17 on the grounds
 10 that request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any
 11 party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent
 12 Plaintiff seeks the following: "All operation manuals or similar DOCUMENTS, etc., utilized by
 13 Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., relating to its compliance with the
 14 federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*" Responding party further
 15 objects to the request to the extent it seeks proprietary or trade secret information. Subject to and
 16 without waiving the foregoing objections, responding party states: Encore will produce its training
 17 manuals utilized in connection with its collection process, training programs and ongoing training
 18 programs upon the entry of a suitable protective order as the documents contain confidential and/or
 19 proprietary information and/or the trade secrets of Encore. Certain materials are written, others are
 20 computerized and others are audio/visual.

21 **REQUEST FOR PRODUCTION NO. 18:**

22 All operation manuals or similar DOCUMENTS, etc., utilized by Defendant, ENCORE
 23 RECEIVABLE MANAGEMENT, INC. relating to its compliance with the California Rosenthal
 24 Fair Debt Collection Practices Act, Cal. Civil Code § 1788 *et seq.*

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

26 Encore objects to Plaintiff's Request for Production of Documents No. 18 on the grounds
 27 that request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any
 28 party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent

Plaintiff seeks the following: "All operation manuals or similar DOCUMENTS, etc., utilized by Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., relating to its compliance with the California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788, et seq."

Responding party further objects to the request to the extent it seeks proprietary or trade secret information. Subject to and without waiving the foregoing objections, responding party states: Encore will produce its training manuals utilized in connection with its collection process, training programs and ongoing training programs upon the entry of a suitable protective order as the documents contain confidential and/or proprietary information and/or the trade secrets of Encore. Certain materials are written, others are computerized and others are audio/visual.

REQUEST FOR PRODUCTION NO. 19:

All **DOCUMENTS** relating to the maintenance of procedures by Defendant, ENCORE RECEIVABLE MANAGEMENT, INC. adapted to avoid any violation of the Federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Encore objects to Plaintiff's Request for Production of Documents No. 19 on the grounds that request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent Plaintiff seeks the following: "All operation manuals or similar DOCUMENTS, etc., utilized by Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., relating to its compliance with the California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788, et seq."

Responding party further objects to the request to the extent it seeks proprietary or trade secret information. Subject to and without waiving the foregoing objections, responding party states: Encore will produce its training manuals utilized in connection with its collection process, training programs and ongoing training programs upon the entry of a suitable protective order as the documents contain confidential and/or proprietary information and/or the trade secrets of Encore. Certain materials are written, others are computerized and others are audio/visual.

REQUEST FOR PRODUCTION NO. 20:

All **DOCUMENTS** relating to the maintenance of procedures by Defendant, ENCORE

RECEIVABLE MANAGEMENT, INC. adapted to avoid any violation of the California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788 *et seq.*

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Encore objects to Plaintiff's Request for Production of Documents No. 20 on the grounds that request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent Plaintiff seeks the following: "All DOCUMENTS relating to the maintenance of procedures by Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., adapted to avoid any violation of the California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788, *et seq.*"

Responding party further objects to the request to the extent it seeks proprietary or trade secret information. Subject to and without waiving the foregoing objections, responding party states: Encore will produce its training manuals utilized in connection with its collection process, training programs and ongoing training programs upon the entry of a suitable protective order as the documents contain confidential and/or proprietary information and/or the trade secrets of Encore. Certain materials are written, others are computerized and others are audio/visual.

REQUEST FOR PRODUCTION NO. 21:

All material, including video and audio tapes, pertaining to training by or for Defendant, ENCORE RECEIVABLE MANAGEMENT, INC. and its employees regarding the Federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Encore objects to Plaintiff's Request for Production of Documents No. 21 on the grounds that request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent Plaintiff seeks the following: "All material, including video and audio tapes, pertaining to training by or for Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., and its employees regarding the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*" Responding party further objects to the request to the extent it seeks proprietary or trade secret information. Subject to and without waiving the foregoing objections, responding party states: Encore will

1 produce its training manuals utilized in connection with its collection process, training programs
 2 and ongoing training programs upon the entry of a suitable protective order as the documents
 3 contain confidential and/or proprietary information and/or the trade secrets of Encore. Certain
 4 materials are written, others are computerized and others are audio/visual.

5 **REQUEST FOR PRODUCTION NO. 22:**

6 All material, including video and audio tapes, pertaining to training by or for Defendant,
 7 ENCORE RECEIVABLE MANAGEMENT, INC. and its employees regarding the California
 8 Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788 *et seq.*

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

10 Encore objects to Plaintiff's Request for Production of Documents No. 22 on the grounds
 11 that request is vague, overly broad, unduly burdensome, not relevant to a claim or defense of any
 12 party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent
 13 Plaintiff seeks the following: "All material, including video and audio tapes, pertaining to training
 14 by or for Defendant, ENCORE RECEIVABLE MANAGEMENT, INC., and its employees
 15 regarding the California Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788, *et*
 16 *seq.*" Responding party further objects to the request to the extent it seeks proprietary or trade
 17 secret information. Subject to and without waiving the foregoing objections, responding party
 18 states: Encore will produce its training manuals utilized in connection with its collection process,
 19 training programs and ongoing training programs upon the entry of a suitable protective order as
 20 the documents contain confidential and/or proprietary information and/or the trade secrets of
 21 Encore. Certain material are written, others are computerized and others are audio/visual.

22 **REQUEST FOR PRODUCTION NO. 23:**

23 All fee agreements between Defendant, ENCORE RECEIVABLE MANAGEMENT, INC.
 24 pertaining to the collection of the debt owed by Plaintiff.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

26 Encore objects to Plaintiff's Request for Production of Documents No. 23 on the grounds
 27 that request is subject to the attorney/client privilege, not relevant to a claim or defense of any
 28 party, and not reasonably calculated to lead to the discovery of admissible evidence to the extent

1 Plaintiff seeks the following: "**All fee agreements between Defendant, ENCORE**
2 **RECEIVABLE MANAGEMENT, INC., and its attorneys** or other DOCUMENTS relating to
3 such fees" (emphasis added).

4 **REQUEST FOR PRODUCTION NO. 24:**


5 A copy of the entire contents of the collection file maintained by Defendant, ENCORE
6 RECEIVABLE MANAGEMENT, INC. pertaining to the collection of the debt owed by Plaintiff.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

8 See attached account notes.

10 DATED: April 3, 2008

CARLSON & MESSER LLP

11
12 By 
13 David J. Kaminski, Esq.
14 Stephen A. Watkins, Esq.
15 Attorneys for Defendant,
16 ENCORE RECEIVABLE MANAGEMENT, INC.

DAN

121

Account Screen
Window: 12

Account: 6019180368616153GE

Voice Track Recordings

Key	File Name	User	Date	Rel. Acct.
4384	V:\GE\20070403\14\1175628159.487	A17W	04/03/2007	6019180368
4448	V:\GE\20070409\15\1176150390.494	A18B	04/09/2007	6019180368
4457	V:\GE\20070410\12\1176225217.494	A18B	04/10/2007	6019180368
4461	V:\GE\20070410\15\1176238536.197	W15B	04/10/2007	6019180368
4509	V:\GE\20070414\13\1176573799.485	B14B	04/14/2007	6019180368

<GOLD-D> for Drill-Down

Wesi
Dad 20

8960405

Already on First Page.

SCAF

Account Screen

Window:

Account: 6019180368616153GE

UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAAAAAA
' Encore Account #: 1188563
' First Name: SAM K Last Name: DADJO
' Addr: 28369 ROCHELLE AVE Social Security #:
' Addr: Home Phone: 510-690-0116
' City: HAYWARD Work Phone: 0
' State: CA Zip: 94544 Old Home Phone:
' Old Work Phone:
' Collector: Load Date: 04/30/2007
' Balance: \$1,214.00
' Pool: Amount Past Due: \$126.00
' SAM K DADJO
AA

Account Screen

Window: 6

Account: 6019180368616153GE

UAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
 , Encore Account #: 1188563
 , First Name: SAM K Last Name: DADJO
 , Addr: 28369 ROCHELLE AVE Social Security #: Home Phone: 510-690-0116
 , Addr: AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
 UAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
 , NJ 04/30/07 11:10P Item modified by Logic Block CLEARCNT.
 , sys 04/30/07 7:41P Unattended Message Left
 , sys 04/30/07 5:58A Modified by NB Batch .
 , sys 04/29/07 10:02A Unattended Message Left
 , sys 04/28/07 6:05A Modified by NB Batch .
 , sys 04/27/07 3:35P Unattended Message Left
 , KMJ2 04/27/07 9:09A Modified by NB Batch .
 , sys 04/27/07 6:29A Modified by NB Batch .
 , sys 04/26/07 1:27P Unattended Message Left
 , sys 04/26/07 6:01A Modified by NB Batch .
 , sys 04/25/07 1:50P Unattended Message Left
 , sys 04/25/07 6:03A Modified by NB Batch .
 AAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAAAAAA

E000003

Account Screen

Window: 6

Account: 6019180368616153GE

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UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
'                               Encore Account #: 1188563
' First Name: SAM K                               Last Name: DADJO
' Addr: 28369 ROCHELLE AVE                         Social Security #:
' Addr:                                             Home Phone: 510-690-0116
UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
' sys 04/20/07 6:05A Modified by NB Batch .
' sys 04/19/07 1:27P Unattended Message Left
' sys 04/19/07 10:27A contacted by dialer (Unattended Messaging) 510-690-0116
'                               (STHOMEPH)
' sys 04/19/07 6:00A Modified by NB Batch .
' sys 04/18/07 2:19P Unattended Message Left
' sys 04/18/07 6:02A Modified by NB Batch .
' sys 04/17/07 4:50P Unattended Message Left
' KMJ2 04/17/07 9:48A Modified by NB Batch .
' NJ 04/17/07 7:47A Account modified by Logic Block BANKOLB. Removed from
'                               Pool 666.
' sys 04/17/07 5:59A Modified by NB Batch .
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAAA

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E000005

Account Screen

Window: 6

Account: 6019180368616153GE

UAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
 1188563

Encore Account #: 1188563

First Name: SAM K Last Name: DADJO
Special Security

3 Addr: 28369 ROCHELLE AVE Social Security #: Home Ph

3 Addr: 28369 ROCHELLE AVE Social Security #
3 Home Phone: 510-690-0116
3 Addr:

[illegible]

3 sys 04/16/07 5:59A Modified by NB Batch .

sys 04/16/07 5:59A Modified by NB Satoh
E1R 04/15/07 1:37P Viewed in Preview Mode. Removed from Pool 667.

```

3 sys 04/14/07 2:44P Unattended Message Left

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3 sys 04/14/07 2:44P Unattended Message Left
3 sys 04/14/07 2:44P Account modified by Logic Block GERSFCO. Removed from
3 Pool 662.

3 B14B 04/14/07 1:03P contacted by dialer 510-690-0116 (STHOMEPH)
3 modified by Logic Block BEGINREC. R

3 B14B 04/14/07 1:03P contacted by dialer 510-850 0110 (510-850 0110)
3 B14B 04/14/07 1:03P Account modified by Logic Block BEGINREC. Removed from
3 Pool 660.

3 sys 04/14/07 6:10A Modified by NB Batch .

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3 sys 04/14/07 6:10A Modified by NR Patch
3 sys 04/13/07 12:21P Unattended Message Left
3 sys 04/13/07 12:21P Modified by NR Patch
```

3 KMJ2 04/13/07 10:37A Modified by NB Batch .

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3 KMJ2 04/13/07 10:37A Modified by NB Batch .
3 KMJ2 04/13/07 10:37A Account modified by Logic Block DECIMP. Removed from

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³ KMJ2 04/13/07 10:37A Account modified by Logic BLOCK SEARCH
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAAAAA

E000007

Account Screen

Window: 6

Account: 6019180368616153GE

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UAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAA
'                               Encore Account #:          1188563
' First Name: SAM K                               Last Name: DADJO
' Addr: 28369 ROCHELLE AVE                         Social Security #:
' Addr:                                             Home Phone: 510-690-0116
UAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAA
' sys 04/11/07 7:04A Account modified by Logic Block GERSFLB. Removed from
'                               Pool 660.
' W15B 04/10/07 3:56P STTPDTE changed from to
' W15B 04/10/07 3:56P STTPAMT changed from $ to $
' W15B 04/10/07 3:56P STCTNXT changed from 04/04/2007 to 04/11/2007
' W15B 04/10/07 3:55P contacted by dialer 800-638-9994 (STWORKPH)
' W15B 04/10/07 3:55P Account modified by Logic Block BEGINREC. Removed from
'                               Pool 662.
' sys 04/10/07 2:44P Account modified by Logic Block GERSFNA. Removed from
'                               Pool 662.
' sys 04/10/07 2:44P WORK STWORKPH - No Answer
' sys 04/10/07 1:26P WORK STWORKPH - Outbound Hold Lost - CALL DROPPED
AAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAA

```

E000008

Account Screen

Account: 6019180368616153GE

Window: 6

```

UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
3                               Encore Account #: 1188563
3 First Name: SAM K                               Last Name: DADJO
3 Addr: 28369 ROCHELLE AVE                         Social Security #:
3 Addr:                                             Home Phone: 510-690-0116
UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
3 A18B 04/10/07 12:13P contacted by dialer 800-638-9994 (STWORKPH)
3 A18B 04/10/07 12:13P Account modified by Logic Block BEGINREC. Removed from
3 Pool 660.
3 sys 04/10/07 11:00A Account modified by Logic Block GERSFNA. Removed from
3 Pool 662.
3 sys 04/10/07 11:00A WORK STWORKPH - No Answer
3 KMJ2 04/10/07 9:19A Modified by NB Batch .
3 sys 04/10/07 8:31A Account modified by Logic Block GERSFNA. Removed from
3 Pool 660.
3 sys 04/10/07 8:31A WORK STWORKPH - No Answer
3 NJ 04/10/07 7:51A Account modified by Logic Block BANKOLB. Removed from
3 Pool 660.
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAAA

```

E000009

Account Screen

Window: 6

Account: 6019180368616153GE

```

UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAA
'      Encore Account #:      1188563
' First Name: SAM K      Last Name: DADJO
'   Addr: 28369 ROCHELLE AVE      Social Security #:
'   Addr:      Home Phone: 510-690-0116
UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAAAAAAA
' sys 04/10/07 6:08A Modified by NB Batch .
' sys 04/09/07 7:01P Account modified by Logic Block GERSFNA. Removed from
'      Pool 660.
' sys 04/09/07 7:01P HOME STHOME PH - No Answer
' sys 04/09/07 3:48P WORK STWORKPH - Outbound Hold Lost - CALL DROPPED
' A18B 04/09/07 3:26P contacted by dialer 800-638-9994 (STWORKPH)
' A18B 04/09/07 3:26P Account modified by Logic Block BEGINREC. Removed from
'      Pool 660.
' sys 04/09/07 11:40A Account modified by Logic Block GERSFNA. Removed from
'      Pool 660.
' sys 04/09/07 11:40A WORK STWORKPH - No Answer
' sys 04/09/07 8:34A Account modified by Logic Block GERSFNA. Removed from
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAA

```

E000010

Account Screen

Window: 6

Account: 6019180368616153GE

```

UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
,      Encore Account #:      1188563
, First Name: SAM K      Last Name: DADJO
,   Addr: 28369 ROCHELLE AVE      Social Security #:
,   Addr:      Home Phone: 510-690-0116
UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
,      Pool 660.
, sys 04/09/07 8:34A WORK STWORKPH - No Answer
, sys 04/09/07 6:02A Modified by NB Batch .
, sys 04/07/07 3:12P Account modified by Logic Block GERSFNA. Removed from
,      Pool 660.
, sys 04/07/07 3:12P WORK STWORKPH - No Answer
, sys 04/07/07 1:54P Account modified by Logic Block GERSFNA. Removed from
,      Pool 660.
, sys 04/07/07 1:54P WORK STWORKPH - No Answer
, sys 04/07/07 11:40A Account modified by Logic Block GERSFNA. Removed from
,      Pool 660.
, sys 04/07/07 11:40A WORK STWORKPH - No Answer
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAAAAAA

```

E000011

Account Screen

Window: 6

Account: 6019180368616153GE

```

UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAA
3
3   Encore Account #: 1188563
3   First Name: SAM K Last Name: DADJO
3   Addr: 28369 ROCHELLE AVE Social Security #:
3   Addr: Home Phone: 510-690-0116
UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAAAAAAA
3 sys 04/07/07 11:06A Account modified by Logic Block GERSFNA. Removed from
3   Pool 662.
3 sys 04/07/07 11:06A WORK STWORKPH - No Answer
3 sys 04/07/07 9:51A Account modified by Logic Block GERSFNA. Removed from
3   Pool 660.
3 sys 04/07/07 9:51A WORK STWORKPH - No Answer
3 sys 04/07/07 8:40A Account modified by Logic Block GERSFNA. Removed from
3   Pool 662.
3 sys 04/07/07 8:40A WORK STWORKPH - No Answer
3 sys 04/07/07 6:05A Modified by NB Batch .
3 A17W 04/03/07 2:23P STPTPDTE changed from to
3 A17W 04/03/07 2:23P STPTPAMT changed from $ to $
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAA

```

E000012

Account Screen

Window: 6

Account: 6019180368616153GE

```

UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAA
'                               Encore Account #:          1188563
' First Name: SAM K                               Last Name: DADJO
' Addr: 28369 ROCHELLE AVE                         Social Security #:
' Addr:                                             Home Phone: 510-690-0116
UAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAAAAAAA
' A17W 04/03/07 2:23P STCTNXT changed from to 04/04/2007
' A17W 04/03/07 2:23P STCODE changed from UNLM to 3BAD
' A17W 04/03/07 2:22P contacted by dialer 800-638-9994 (STWORKPH)
' A17W 04/03/07 2:22P Account modified by Logic Block BEGINREC. Removed from
' Pool 660.
' KMJ2 04/03/07 10:13A Modified by NB Batch .
' sys 04/03/07 6:03A Modified by NB Batch .
' sys 04/02/07 5:16P Unattended Message Left
' sys 04/02/07 6:02A Modified by NB Batch .
' NJ 03/31/07 10:49P Item modified by Logic Block CLEARCNT.
' sys 03/31/07 6:21A Modified by NB Batch .
' sys 03/30/07 12:45P Unattended Message Left
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAA

```

E000013

Account Screen

Account: 6019180368616153GE

Window: 6

UAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAAAAA
1188563

Encore Account #: 1188563

First Name: SAM K Last Name: DADJO

3 Addr: 28369 ROCHELLE AVE Social Security #: Home Ph:

3 Addr: 28369 ROCHELLE AVE Home Phone: 510-690-0116
3 Addr: #####

[illegible]

3 KMJ2 03/30/07 9:57A Modified by NB Batch .

sys 03/30/07 6:05A Modified by NB Batch .

3 sys 03/29/07 8:34P Unattended Message Left

3 sys 03/29/07 8:34P Unattended Message 2010
3 sys 03/29/07 8:34P Account modified by Logic Block GERSFCO. Removed from

3 Pool 662.

3 sys 03/29/07 5:58A Modified by NB Batch .

```

sys 03/28/07 3:53P Unattended Message Left
sys 03/28/07 1:54P Unattended Message Left

```

```

3 sys 03/28/07 6:01A Modified by NB Batch .

```

3 sys 03/27/07 4:11P Unattended Message Left

```

3 sys 03/27/07 4:11P Unattended Message Here
3 sys 03/27/07 12:39P Account modified by Logic Block GERSFNA. Removed from

```

3 Pool 666.

3 sys 03/27/07 12:39P HOME STHOMEPH - No Answer

```
3 sys 03/27/07 12:39P HOME STHOME9PH - NO ANSWER
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA
```

Window: 6

Window: 6

AAAAAAAAAAAAAAAAAAAAA<Gold><S> for search

Account Screen

Window: 6

Account: 6019180368616153GE

UAAAAAAAAAAAAAAAAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAAAAAAAAAA
" 1188563

Encore Account #: 1188563

First Name: SAM K Last Name: DADJO

Addr: 28369 ROCHELLE AVE Social Security #:

SOCIAL SECURITY #
Home Phone: 510-690-0116
Addr:

3 Addr: Home Phone: View All Notes

```

' sys 03/22/07 5:56A Modified by NB Batch .

```

```

3 sys 03/21/07 6:15A Modified by NB Batch .

```

3 NJ 03/20/07 9:25A Modified by NB Batch .

3 KMJ2 03/20/07 9:11A Modified by NB Batch .

3 sys 03/20/07 6:06A Modified by NB Batch .

```
sys 03/20/07 3:00P Outbound Call - Connected
sys 03/19/07 2:45P Outbound Call - Connected
```

```

3 MLH 03/19/07 2:02P Modified by NB Batch .

```

3 MLH 03/19/07 2:02P STCODE changed from UNLM to

3 NJ 03/19/07 7:14A Letter 400 printed on 03/19/2007 7:02AM

3 sys 03/19/07 6:04A Modified by NB Batch

3 sys 03/18/07 1:52P Outbound Call - Connected

```

1 sys 03/18/07 1:52P Unattended Message Left
3 sys 03/17/07 3:49P Unattended Message Left

```

```

sys      03/17/81  09:16:00
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA<Gold><S> for SearchAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA

```

Account Screen

Window: 6

Account: 6019180368616153GE

AAAAAAAAAAAAAA General Information AAAAAAAAAAAAAAAAAA

, Encore Account #: 1188563

Encore Account #: 1188563

First Name: SAM K Last Name: DADJO
Social Security: 123-45-6789

3 Addr: 28369 ROCHELLE AVE Social Security #: Home Ph

3 Addr: 28309 ROCHESTER AVE Home Phone: 510-690-0116
3 Addr:

' Addr:

0AAAAAAAAAAAAAAAAAAAAA View All Notes AAAAAAAAAAAAAAAAAAAAA

```

, sys 03/17/07 3:49P STCODE changed from to UNLM

```

3 KLS2 03/17/07 10:56A Letter 400 sent on 60706.

3 KLS2 03/17/07 10:56A Letter 400 requested.

3 KLS2 03/17/07 10:56A Modified by NB Batch .

3

3

3

3

3

3

3

3

`\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA<Gold><S> for Search\AA\AA\AA\AA\AA\AA\AA\AA\AA\AA`

NEW FDR-NET 10.174.95.246 - myEXTRA!Enterprise

DADJO, SON K*28369 ROCHELLE AVE**HAYWARD*CA*94544-5449*6019180368616153*0

AGENT BANK NAME CARE CREDIT/GENB 03/31/08 08:45
 CURRENT BAL 0.00 STATUS CODES INIT/EXT /2 HOME PHONE 510-690-0116
 AVAILABLE CR 3000 CYCLE CODE/HOLD CODE 019 WORK PHONE
 LAST PNT AMT 30 LAST MONETARY 07-02-07 Y # DAYS DELINQUENT 0
 LAST PNT DATE 12-09-06 OPEN DATE 11-05 EXP 99-99 COL CD 099 DEL SCN 0000
 AMOUNT DUE 0 LAST REAGE DATE WORK DATE 05-01-07
 AMT DELINQ 0 REAGE 00 AUTH FLAG PRI SOC SECA ***-0-0507
 PNT DUE DATE 03-26-08 AMT 1 CYC DEL 0.00 SEC SOC SECA 000-00-0000
 NON DELQ AMT DUE 0 AMT 2 CYC DEL 0.00 DISP 0 0 0
 FIXED PAY AMT 0.00 AMT 3 CYC DEL 0.00 SCORE: BH 577 CR 099
 PROMISE DATE 00-00-00 AMT 4 CYC DEL 0.00 PREV REAGE
 PROMISE AMOUNT AMT 5 CYC DEL 0.00 MISC F BEN 02
 DATE LAST STMT 11-01-07 AMT 6 CYC DEL 0.00 PRIOR REAGE
 XRF 1 0000000000000000 XRF 2 0000000000000000 XRF 3 0000000000000000
 164 042407 *COLL STTLNNT TAX OFFER 64-24 \$789.00 GOOD FOR 30 DAYS
 164 032807 *COLL STTLNNT TAX OFFER 03-20 \$922.00 GOOD FOR 30 DAYS
 GAS 082207 *COLL TSYS - CASE:0741331, CH 7, DISCHARGED ON 07/31/07
 GAS 060607 *COLL TSYS - CASE:0741331, CH 7, FD 05/02/07 BK BAL: \$1,214.16
 GAS 060607 *COLL TSYS...PETITION SOURCE: PAPER KEY: 0741331*CAN#4
 018 07-02-07 807 241 B M CO 017 05-04-07 847 TO B SC

02:00.3

01/03

E000018

NEW FDR-NET 10.174.95246 - myEXTRA!Enterprise

GMS CTSIDISPLAY

08030, SAN R **28069 ROCHELLE RUE**HAYWARD*CA*94544-5449*6019180368616150*0
 ACCOUNT # 6619180368616150
 PAGE 001

CHDS S=SELECT C/U=UPDATE D=DELETE

C USER TYPE DATE TIME MEMO TEXT

164	*COLL	042407	1438	STTLMT TAX OFFER 04-24	\$789.00 GOOD FOR 30 DAYS
164	*COLL	032007	1502	STTLMT TAX OFFER 03-20	\$922.00 GOOD FOR 30 DAYS
GAS	*COLL	082207	1429	TSYS - CASE:0741331, CH 7.	DISCHARGED ON 07/31/07
GAS	*COLL	060607	1513	TSYS - CASE:0741331, CH 7.	FD 05/02/07 BK BAL: \$1,214*
GAS	*COLL	060607	1513	TSYS...PETITION SOURCE: PAPER KEY: 0741331*CAN**4	
GAS	*COLL	052107	1424	TSYS - CASE:0741331, CH 7.	FD 05/02/07 BK BAL: \$1,214*
GAS	*COLL	052107	1424	TSYS...PETITION SOURCE: PAPER KEY: 0741331*CAN**4	
GAS	*COLL	051807	0936	TSYS - CASE:0741331, CH 7.	FD 05/02/07 BK BAL: \$1,214*
GAS	*COLL	051807	0936	TSYS...PETITION SOURCE: PAPER KEY: 0741331*CAN**4	
GAS	*COLL	051807	0825	TSYS - CASE:0741331, CH 7.	FD 05/02/07 BK BAL: \$1,214*
GAS	*COLL	051807	0825	TSYS...PETITION SOURCE: PAPER KEY: 0741331*CAN**4	
GAS	*COLL	050407	1442	TSYS - CASE:0741331, CH 7.	FD 05/02/07 BK BAL: \$1,214*
GAS	*COLL	050407	1442	TSYS...PETITION SOURCE: EBH KEY: 0741331*CAN**4	
GAS	*COLL	050407	1442	ATTY: FRED U SCHUINN	
GAS	*COLL	050407	1442	ATTY ADDR: CONSUMER LAW CENTER, INC.	
GAS	*COLL	050407	1442	ATTY CITY: SAN JOSE	
F2=000	NEW	MEMO	PF5=PI1	F7=BACK	F8=FORWARD

SELECT 0 MEMO & ENTER OR PRESS PF KEY

U2NENTRN 00

07:00.1

01/03

E000019

NEW FDR-NET 10.174.95.246 - myEXTRA! Enterprise

GMS CDS DISPLAY

DADJO, SAR N*28369 ROCHELLE QUE*NAVARD*CA=94544-5449*6019186368610150*0

ACCOUNT # 6019186368610150

PAGE 002

CHDS S=SELECT C/U=UPDATE D=DELETE

C USER TYPE DATE TIME MEMO TEXT

GAS *COLL 050407 1442 *ATTY STATE: CA

GAS *COLL 050407 1442 *ATTY ZIP: 95113

GAS *COLL 050407 1441 *CRICDE: BGA09

GAS *COLL 050407 1441 *STS: PRIMARY

GAS *COLL 050407 1441 *ODJ: 07/00/07

GAS *COLL 050407 1441 *ATTY PRN: 4082940100

GAS *COLL 050407 1441 *TRUSTEE: TEVIS THOMPSON

GAS *COLL 050407 1441 *TRUSTEE ADDR: P.O. BOX 1110

GAS *COLL 050407 1441 *TRUSTEE CITY: MARTINEZ

GAS *COLL 050407 1441 *TRUSTEE STATE: CA

GAS *COLL 050407 1441 *TRUSTEE ZIP: 94552

GAS *COLL 050407 1441 *TRUSTEE PRN: 9252260120

GAS *COLL 050407 1441 *GRP: 7

GAS *COLL 050407 1441 *FLD: 05/02/07

GAS *COLL 050407 1441 *CSO: 0741331

DS5 *COLL 031006 1310 REF LPF 29.06, PRNO MISUNDERSTANDING, PAYMENT REQUIRED

F2=ADD NEW MEMO PF5=PI1 F7=BACK F8=FORWARD

U2MENTRN 00

SELECT A MEMO & ENTER OR PRESS PF KEY

01/03

01:00.1

E000020

NEW FDR-NET 10.174.95.246 - myEXTRAI Enterprise

ECHS C/SDISPLAY

DADJO, SAN R**28869 ROCHELLE AVE**HAYWARD*CA*94544-5459*6019180068616152*0

ACCOUNT # 6019180068616153

PAGE 003

CHDS S=SELECT C/U=UPDATE D=DELETE

MEMO TEXT

C USER TYPE DATE TIME REFER CALL TO COLLECTIONS- BALANCE INVALID- ABANDONED*

DB1 PCIS 110507 1005 MARCH 2008 ARCHIVED 00021 MEMOS

FDR ARCHIV 031508 0844 FEBRUARY 2008 ARCHIVED 00003 MEMOS

FDR ARCHIV 021608 0418 FEBRUARY 2008 ARCHIVED 00003 MEMOS

29 110507 0151 010507 N UP03001 NH-029 HEUQUEVE=099 PREV=007

DB1 57 110207 0838 CR BUREAU FLAG OLD FIELD= 1 NEW FIELD= 2

DB1 22 102107 1224 NH-022 = 01 PREV CYCLE = 16

NH 79157 082207 2117 NH-791 57 CRED BUR BANKRPTCY DT OLD = 20070504 NEW = *

CAS 132 082207 1420 NH-132 CRED BUR FLAG 2 OLD = A 01 NEW = E 01

NH 16 070207 2012 NH-016 = 2 PREV STATUS = B

035 972 070207 0131 0000 035 ACCOUNT CHARGED OFF 1214.16 DATE 07/07/02

NH 79157 050407 2106 NH-791 57 CRED BUR BANKRPTCY DT OLD = 00000000 NEW = *

NH 79157 050407 2106 NH-791 57 CRED BUR BANKRPTCY DT OLD = 20070504 NEW = *

NH 18 050407 2106 NH-018 NEW INT SV = 2 OLD INT SV =

NH NH1188 050407 1453 05/00/2007 15:54:00 HOME PHONE, AND (PSF)

003 132 050407 1441 NH-132 CRED BUR FLAG 2 OLD = NEW = A 01

003 28 050407 1441 NH-028 NEW REASON CODE = 67 OLD REASON CODE = 00

F2=ADD NEW MEMO PF5=PI1 F7=BACK F8=FORWARD

U2NEWTRM 00

SELECT & MEMO & ENTER OR PRESS PF KEY

01/03

0:00.2

E000021

NEWFDR-NET 10.174.95.246 - myEXTRA! Enterprise

QCHS C1SDISPLAY

D8DJ0,SAM R**28369 ROCHELLE AVE**HAYWARD*00*94544-5449*6019180368616152*0
 ACCOUNT # 6019180368616153

PAGE 004

CHDS S=SELECT C/U=UPDATE D=DELETE

C USER TYPE DATE TIME HEMO TEXT

GAS 5193 050407 1441 NH-051 = W PREV STMT HOLD CODE = Y

GAS 16 050407 1441 NH-016 = B PREV STATUS =

NH NH118X 050407 1338 05/04/2007 12:05:37 HOME PHONE, AND (RSF)

GAS 29 050407 0155 050407 H UJ68 GAS NH-029 NEWQUEUE=847 PREV=000

NH NH118X 050607 1358 05/02/2007 21:53:14 HOME PHONE, AND (RSF)

NH NH118X 050207 1501 05/01/2007 20:45:46 HOME PHONE, AND (RSF)

00 197 942407 0745 H\$44164 NH-197 LETTER = STAX

NH NH118X 041107 1339 04/10/07 14:44:00 DP, NO ANSWER (ENC)

NH NH118X 040907 0747 04/09/07 19:01:00 HP, NO ANSWER (ENC)

NH NH118X 040807 0920 04/07/07 15:12:00 DP, NO ANSWER (ENC)

NH NH118X 032907 1453 03/27/07 12:39:00 HP, NO ANSWER (ENC)

NH NH118X 032507 1030 02/24/07 12:47:00 HP, NO ANSWER (ENC)

0# 197 032007 0933 H\$44164 NH-197 LETTER = STAX

NH NH118X 031607 1339 03/16/07 10:38:01 HP, NO ANSWER (GCS)

NH NH118X 031607 1239 03/15/07 22:32:45 HP, NO ANSWER (GCS)

NH NH118X 031507 1211 03/13/07 22:56:55 HP, NO ANSWER (GCS)

F2=ADD NEW HEMO PF3=PI1 F7=BACK F8=FORWARD

SELECT A HEMO & ENTER OR PRESS PF KEY

02HEMTRN 00

81/03

00:00.2

E000022

NEW FDR-NET 10.174.95.246 - myEXTRA! Enterprise

GCHS CDSIDISPLAY

08010.SAM R**28369 ROCHELLE AVE**HAYWARD*00*94544-5449*6019180368616153*0
 ACCOUNT 0 6010180368616153 PAGE 005

CHDS S=SELECT C/U=UPDATE D=DELETE

C USER TYPE DATE TIME

MEMO TEXT

HH	NH118X	031407	1241	03/12/07	22:10:09	HP, NO ANSWER (GCS)
NH	NH118X	031307	1341	03/11/07	22:54:27	HP, NO ANSWER (GCS)
NH	NH118X	030907	2055	03/09/07	15:17:07	HP, NO ANSWER (GCS)
NH	NH118X	030907	1130	03/09/07	22:56:56	HP, NO ANSWER (GCS)
NH	NH118X	030807	1206	03/07/07	22:09:00	HP, NO ANSWER (GCS)
NH	NH118X	030707	1326	03/06/07	22:48:15	HP, NO ANSWER (GCS)
NH	NH118X	030607	1322	02/05/07	22:22:57	HP, NO ANSWER (GCS)
NH	NH118X	022807	1250	02/27/07	13:15:08	HP, NO ANSWER (GCS)
NH	NH118X	022707	1328	02/26/07	22:48:50	HP, NO ANSWER (GCS)
NH	NH118X	022607	1235	02/25/07	22:56:49	HP, BUSY (GCS)
NH	NH118X	022307	1215	02/22/07	22:59:04	HP, NO ANSWER (GCS)
NH	NH118X	022907	1206	02/23/07	12:14:28	HP, NO ANSWER (GCS)
NH	NH118X	022207	1237	02/21/07	22:17:30	HP, NO ANSWER (GCS)
NH	NH118X	022107	1331	02/20/07	22:47:11	HP, NO ANSWER (GCS)
NH	NH118X	022007	1354	02/19/07	22:26:27	HP, NO ANSWER (GCS)
NH	NH118X	021707	1513	02/18/07	22:48:02	HP, NO ANSWER (GCS)

F2=ADD NEW MEMO PF5=PI1

F7=DACK F8=FORWARD

SELECT 0 MEMO & ENTER OR PRESS PF REV

V2NENTRN 00

01/03

00:00.2

E000023

E000024

NEW FDR-NET 10.174.95.246 - myEXTRA! Enterprise

GCHS CISO DISPLAY

DADJO, SAN R **28869 ROCHELLE RUE**HAYWARD*CA*94544-5449*6019100068510153*0
ACCOUNT # 6019100068510153

PAGE 006

CHDS S=SELECT C/U=UPDATE D=DELETE

C USER	TYPE	DATE	TIME	MEMO TEXT
NR	NR118X	021607	1301	02/15/07 22:43:08 HP, NO ANSWER (GCS)
NR	NR118X	021607	1131	02/16/07 15:30:10 HP, NO ANSWER (GCS)
NR	NR118X	021507	1226	02/14/07 22:20:59 HP, NO ANSWER (GCS)
NR	NR118X	021407	1300	02/13/07 22:29:45 HP, NO ANSWER (GCS)
NR	NR118X	021307	1206	02/12/07 22:42:22 HP, NO ANSWER (GCS)
NR	NR118X	020507	0825	02/04/07 22:31:46 HP, NO ANSWER (GCS)
NR	NR118X	020207	1306	02/02/07 15:11:56 HP, NO ANSWER (GCS)
NR	NR118X	020107	1430	01/31/07 22:42:37 HP, NO ANSWER (GCS)
NR	NR118X	020107	1341	02/01/07 22:37:12 HP, NO ANSWER (GCS)
NR	NR118X	013107	1552	01/30/07 22:41:52 HP, NO ANSWER (GCS)
NR	NR118X	012007	1523	01/29/07 22:04:20 HP, NO ANSWER (GCS)
NR	NR118X	012907	1230	01/28/07 22:55:37 HP, NO ANSWER (GCS)
NR	NR118X	012607	1352	01/25/07 22:40:02 HP, NO ANSWER (GCS)
NR	NR118X	012607	1206	01/26/07 14:22:11 HP, NO ANSWER (GCS)
NR	NR118X	012507	1439	01/24/07 16:51:42 HP, NO ANSWER (GCS)
NR	NR118X	012407	1450	01/23/07 22:54:57 HP, NO ANSWER (GCS)

F2=ADD NEW MEMO F5=PI1

F7=BACK F8=FORWARD

02HENTRN 00

SELECT 0 MEMO & ENTER OR PRESS PF KEY

01/03

02:00.2

NEW FDR-NET 10.174.95.246 - myEXTRA!Enterprise

EENS C1SDISPLAY

DADJO, SAM R **28369 ROCHELLE AVE**HAYWARD*00*04544-5049*6019180368616153*0
ACCOUNT # 6019180368616153

PAGE 007

CHDS S=SELECT C/U=UPDATE D=DELETE

C USER	TYPE	DATE	TIME	MEMO TEXT
NN	NN118X	042307	1453	04/22/07 15:55:51 HP, NO ANSWER (GCS)
NN	NN118X	042207	1303	04/20/07 12:46:18 HP, NO ANSWER (GCS)
NN	NN118X	041907	1556	04/18/07 21:31:41 HP, NO ANSWER (GCS)
NN	NN118X	041907	1008	04/19/07 14:41:57 HP, NO ANSWER (GCS)
SNG WS		041707	1101	04172007110138BILLING STATEMENTUSH
SNC PS		041707	1101	04172007110138PAYMENTUSN
NN	NN118X	042306	1208	04/27/06 22:27:05 HP NO ANSWER (GCS)
NN	NN118X	042606	0921	04/25/06 22:06:49 HP NO ANSWER (GCS)
NN	NN118X	042406	0708	04/23/06 22:33:29 HP NO ANSWER (GCS)
NN	NN118X	042106	0920	04/20/06 12:46:40 HP ANS MACH (GCS)
NN	NN118X	042006	0356	04/19/06 22:39:40 HP NO ANSWER (GCS)
NN	NN118X	041906	0953	04/18/06 22:39:57 HP NO ANSWER (GCS)
RG2 22143		031706	0735	030802 TC282 DTID LF AM0000000002900 AM200000000000+
SM 949		031606	0100	**SUNHARY*** ACTION ENTRY: 5 PROMISE/PAYS: 1
NN	NN1150	021006	0733	02/10/06 9K49
NN	NN1150	020206	0443	02/02/06 9K49

F2=ADD NEW MEMO PF5=PI1 F7=DACK F8=FORWARD

SELECT A MEMO & ENTER OR PRESS PF KEY

V2MENTRN 00

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NEW FDR-NET 10.174.95.246 - myEXTRA! Enterprise

CHDS CYSIDISPLAY

DADJO, SAN K*28869 ROCHELLE AVE**HAYWARD*CA*94544-5449*6019180868616152*0
ACCOUNT N 6019180868616153
PAGE 008

CHDS S=SELECT C/U=UPDATE D=DELETE

C USER TYPE DATE TIME

00 975 120205 0237 00030000 WITH PAY DEFERRED INTEREST

NA HAC17* 111705 0145 *NEAR RELN 510-690-9670 COAP HM 0009-0000 WPH 000-*

MEMO TEXT

F2=00D NEW MEMO PF5=PI1 F7=BACK F8=FORWARD

SELECT 0 MEMO & ENTER OR PRESS PF KEY

U2NENTRN 00

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myEXTRA! Enterprise

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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
 COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California.

I am over the age of eighteen years and not a party to the within action. my business address is 5959 W. Century Blvd., Suite 1214, Los Angeles, California 90045.

On **April 3, 2008**, I served the foregoing document(s) described as: **DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** on all interested parties in this action by:

SEE ATTACHED SERVICE LIST

☐ **BY ELECTRONIC MAIL** : Based on Court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the said documents to be sent to the persons at the electronic mail addresses listed below (see attached service list). I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **BY MAIL**: I sealed such envelope(s) and placed it (them) for collection and mailing on this date following the ordinary business practices of Carlson & Messer LLP. I am "readily familiar" with the business practices of Carlson & Messer LLP for collection and processing of correspondence for mailing with the United States Postal Service. Such correspondence would be deposited with the United States Postal Service at Los Angeles, California this same day in the ordinary course of business with postage thereon fully prepaid.

☐ **BY FACSIMILE**: On the date set forth below, at approximately _____, I transmitted the above document(s) from facsimile machine number (310)242-2222, in compliance with transmission as provided in California Rule of Court 2008. The fax number(s) that I used are shown above or on the attached Service List, along with the names of recipients and the interested parties. The Facsimile Machine I used complied with California Rule of Court 2003(3). The transmission was reported as complete and without error by the machine, which properly issued the transmission report.

☐ **BY PERSONAL SERVICE BY HAND**: I personally served said document(s) on the date set forth below, by personally hand serving the aforementioned document to (See Service List)

☐ **(STATE)** - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ **(FEDERAL)** - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed this **3rd day of April, 2008**, at Los Angeles, California.


 Deborah A. Nash

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SERVICE LIST
Samuel Kwest Dadjo v. Encore Receivable Management, Inc.
Our File No . 05704.00

Fred W. Schwinn, Esq.
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